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January 17, 2023

VIA ECF

Special Master the Honorable Thomas Vanaskie
Stevens & Lee
1500 Market Street, East Tower
18th Floor
Philadelphia, PA 19103

Re: In re Valsartan, Losartan, and Irbesartan Products Liability Litigation
Case No. 1:19-md-02875-RBK-JS

Dear Special Master Vanaskie:

This letter is to provide Defendants' positions with respect to the topics on the agenda for the Teleconference with Your Honor on January 19, 2023. The parties do not expect the need to discuss any confidential materials as part of these agenda items.

1. CMO 29 Case Schedule

The parties jointly respectfully request that the Court issue an order modifying certain deadlines contained in Case Management Order No. 29 ("CMO 29"), ECF No. 2154, related to liability experts, and Case Management Order No. 30 ("CMO 30"), ECF No. 2190, related to damages experts, as set forth in the tables below.

CMO 29 Deadlines

| Event | Current Deadline | Proposed New Deadline |
|--|-------------------------|------------------------------|
| <i>Daubert</i> motions filed regarding liability experts | February 13, 2023 | February 27, 2023 |
| Responsive briefs on <i>Daubert</i> motions filed | March 6, 2023 | March 20, 2023 |



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| Reply briefs on <i>Daubert</i> motions filed | March 20, 2023 | April 3, 2023 |
| Dispositive motions filed | February 27, 2023 | March 13, 2023 |
| Responsive briefs on dispositive motions filed | April 3, 2023 | April 17, 2023 |
| Reply briefs on dispositive motions filed | April 24, 2023 | May 8, 2023 |

CMO 30 Deadlines

| Event | Current Deadline | Proposed New Deadline |
|---|-------------------------|------------------------------|
| Plaintiff MSPRC to serve expert report(s) concerning damages | January 20, 2023 | February 3, 2023 |
| TPP Trial Defendants to serve expert report(s) concerning damages | March 10, 2023 | March 24, 2023 |
| Deadline to complete experts' depositions concerning damages | April 10, 2023 | April 24, 2023 |
| Deadline for Rule 702/ <i>Daubert</i> motions on experts' reports concerning damages | April 17, 2023 | May 1, 2023 |
| Deadline for responsive briefs to Rule 702/ <i>Daubert</i> motions on experts' reports concerning damages | May 8, 2023 | May 22, 2023 |
| Deadline for reply briefs to Rule 702/ <i>Daubert</i> motions on experts' reports concerning damages | May 22, 2023 | June 5, 2023 |

2. Losartan/Irbesartan PFS Order

At the December 14, 2022 status conference, the Court directed the parties to submit a proposed order entering the Amended Personal Injury Plaintiff's Fact Sheet ("Amended PFS") and identifying the plaintiffs who must complete the Amended PFS. Accordingly, the parties have met and conferred and have agreed on the attached proposed order. (Attached as **Exhibit 1.**)



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3. TPP Motion to Compel Briefing Completed

Defendants note that briefing on the Motion to Compel Production of Documents and Data Relevant to Plaintiff's Alleged Damages and to Set Deadlines for Damages Experts (ECF No. 2178), including Plaintiffs' Brief (ECF No. 2181), has been completed as of October 20, 2022.

Respectfully submitted,

/s/ Lori G. Cohen

Lori G. Cohen

cc: Adam Slater, Esq. (*via email, for distribution to Plaintiffs' Counsel*)
Jessica D. Miller, Esq. (*via email, for distribution to Defendants' Counsel*)
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